

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

|   |   |                         |
|---|---|-------------------------|
| In re:  | ) |                         |
|   | ) | Chapter 11              |
|   | ) |                         |
| FIRST GUARANTY MORTGAGE CORPORATION, <i>et al.</i> , <sup>1</sup> | ) | Case No. 22-10584 (CTG) |
|   | ) |                         |
| Debtors.  | ) | (Jointly Administered)  |
|   | ) |                         |

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON JULY 11, 2023 AT 10:00 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE CRAIG T. GOLDBLATT IN THE U.S. BANKRUPTCY COURT, 824 NORTH MARKET STREET, 3<sup>RD</sup> FLOOR, COURTROOM 7, WILMINGTON, DELAWARE 19801**

**This hearing will be conducted in-person. All parties, including witnesses, are expected to attend in person unless permitted to appear via Zoom. Participation at the in-person court proceeding using Zoom is allowed only in the following circumstances: (i) a party who files a responsive pleading intends to make only a limited argument; (ii) a party who has not submitted a pleading but is interested in observing the hearing; or (iii) other extenuating circumstances as determined by Judge Goldblatt. All participants over Zoom must register in advance. Please register by July 10, 2023 at 4:00 p.m.**

**COURTCALL WILL NOT BE USED FOR THIS HEARING.**

**Please use the following link to register for this hearing:**

<https://debuscourts.zoomgov.com/meeting/register/vJlSd-Gvpj0rEj7cBO3Nodpxf5EkBWnAR3I>

**After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.**

**I. CONTESTED MATTERS GOING FORWARD**

1. *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed December 13, 2022) [Docket No. [711](#)]

**Response Deadline:** January 24, 2023 at 4:00 p.m.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The location of the corporate headquarters and the service address for First Guaranty Mortgage Corporation is 13901 Midway Road, Suite 102-334, Dallas, TX 75244.

**Responses Received**

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 24, 2023) [Docket No. [762](#)]

**Related Documents**

- A. Notice of Hearing on Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 10, 2023) [Docket No. [749](#)]
- B. Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. [766](#)]

**Status:** This matter is going forward.

- 2. *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed December 13, 2022) [Docket No. [712](#)]

**Response Deadline:** January 24, 2023 at 4:00 p.m.

**Responses Received:**

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. [761](#)]
- B. Objection of B2 FIE XI LC AND LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. [763](#)]
- C. Liquidating Trustee's Supplemental Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed June 21, 2023) [Docket No. [835](#)]

**Related Documents:**

- A. Notice of Hearing on *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 10, 2023) [Docket No. [750](#)]
- B. Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. [766](#)]

**Status:** This matter is going forward.

- 3. *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 15, 2023) [Docket No. [833](#)]

**Response Deadline:** June 22, 2023 at 4:00 p.m. (Extended to June 23, 2023 as to the Liquidating Trustee and the Lenders)

**Responses Received:**

- A. Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 23, 2023) [D.I. [843](#)]
- B. Objection of B2FIE XI LLC and LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Chapter 11 Plan to (1) Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and (2) to Pursue the *Qui Tam* Action Solely to the Limits and Proceeds of Insurance (Filed June 23, 2023) [D.I. [844](#)]

**Status:** This matter is going forward.

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**Dated:** July 7, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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